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*Federal Communications Commission  
re: RM-10867*

*Via electronic submission*

*March 24, 2004*

*Commissioners:*

*The American Radio Relay League proudly calls itself “The national association for amateur radio,” and indeed, the ARRL is just that. No other group or organization has promoted the true interests of both radio amateurs and radio technology in the United States for so long or so well.*

*The ARRL has put forth a reorganization plan that I believe best balances the interests of ALL radio amateurs in the US. It opens a track that offers good prospects of attracting new youth—inquisitive minds that are now more fascinated by the internet and other digital modes than by amateur radio. No cliché embraces more truth than “our youth are the hope of tomorrow.”*

*The ARRL proposal puts the proper emphasis on the initiation and subsequent development of skilled and responsible radio amateurs by clear and compelling incentive path. Whetting a new Novice’s appetite for world-wide contact by phone is the kind of incentive that could result in eager study and willing upgrade.*

*The Morse code requirement has been all but abandoned around the world. That does not, I stress to you, mean that the use of the code is dead or will disappear. There is a fascination with the code that is born of familiarity with the vagaries of high frequency communication, and the development of skill in telegraphy is the natural product of time spent between “cans.” Love of the code will*

*grow among a certain unforeseeable, but perhaps significant, percentage of newbies as they advance along the path the ARRL seeks to create with this proposal. To sweeten the lure, the ARRL proposal mandates a continued code requirement for the top level of license, a wise move it seems to me. "Extra" is still a prize worthy of capture, despite the plethora of sarcastic name calling ("Extra Light") by a coterie of frustrated amateurs who feel slighted by the last ruling changes that reduced the level of telegraphy skills required for that envied license grade.*

*Other proposals now before the Commission seek to remove the code requirement entirely or to disinter higher levels of code proficiency than now mandated. I think the ARRL proposal strikes the right balance. To return to a more rigorous telegraphy test for either the entry or the intermediate licenses is, to my mind, exactly the wrong course to take. I would rather see the Commission remove the Morse code requirement entirely than to see the US turn back the clock, and in so doing, turn our backs on the rest of the world's amateurs.*

*No less important to my mind is the salutary effect that the restructuring of the licenses and the "refarming" of the bands, and consequent attracting of new blood into the hobby may have on amateur radio equipment and accessory manufacturers, distributors and retailers—all of which are endangered species in the current ham radio climate. Rolling back the clock to more difficult hurdles to licensing could push a number of firms under. Opening HF to more and newer operators could usher in a mini-renaissance for some manufacturers, and the ripple effect may, I think, rejuvenate interest in the higher bands, as well.*

*Many voices are being raised in objection to the elimination of a code requirement for operation on HF bands. The arguments range from assertions about a new wave of "CB operators" wreaking havoc on the bands to the ages-old lament "they should have to pass the test that I had to pass back in ought-nine." When all is said and done, none of these arguments have merit. There is nothing now that can prevent an outlaw "CB operator" from buying a HF rig and using it illegally. Changing the requirements for legal operation will have no influence on the outlaws (which, to state the obvious, is why they're outlaws, a point that many who pose the "CB" argument never seem to grasp). The same hysterical cries were heard when the "no-code Technician" license was introduced. Not only did the horror not materialize, but alas, most of those new Technicians lost interest in the hobby and fell away to other pursuits. I, until very recently, was one of them. It was*

*the ARRL proposal, to be frank, that lured me back to the fold. As to the other argument, it is without foundation, as well as hopelessly spiteful: I didn't have to go through what my grandfather went through to drive an automobile.*

*Times change.*

*Let's let amateur radio in the US change with them. Progress is always painful for some of us, but greatly beneficial for most. I ask you to adopt the ARRL proposal, either keeping the 5 wpm mandate for Extra as proposed, or by eliminating the code requirement entirely, but by carrying out the ARRL license restructuring and "refarming" proposals. Whichever course you choose with regard to the telegraphy requirement, the code will not go away; it is much too popular, even among the hams of those nations which have "banished" it. It will continue in use, both by hand and by keyboard.*

*Amateur radio is one of America's great resources. It is an avenue of communication that can prove indispensable in time of emergency, and we can ill afford to continue to train too few skilled operators. It is also a way of letting everyday Americans interact easily and informally with people all around the world, thereby deflating a lot of the rhetoric about "ugly Americans." RF knows neither borders nor ideologies. The FCC has an opportunity to open new horizons for many young Americans, and to promote a path that will bring benefit to everyone in the years ahead.*

*Thank you,*

A handwritten signature in black ink, consisting of a large, stylized 'A' followed by a horizontal line.

*Albert Schramm*